

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JONATHAN EDWARD WORKMAN,) CASE NO.: 1:19-CV-00862
)
Plaintiff,) JUDGE: DAN AARON POLSTER
)
vs.) **MOTION TO PERMIT TELEPHONE**
CITY OF CHARDON, et al.,) **ATTENDANCE OF DEFENDANTS'**
) **INSURANCE REPRESENTATIVE**
Defendants))
)
)

Now come Defendants who hereby respectfully request that their insurance representative, William Rivard, Jr. of Tokio Marine HCC Public Risk Group, be permitted to attend by telephone the Case Management Conference presently scheduled in this matter for September 20, 2019 at 9:00 a.m. (ECF 15). The reason for this Motion is that Mr. Rivard is based in Auburn Hills, Michigan, a 3 ½ - 4 hour drive to Cleveland. Mr. Rivard will be immediately available by telephone for consultation during the course of the Case Management Conference.

In view of the foregoing, Defendants respectfully request that their insurance representative be permitted to attend the foregoing Case Management Conference by telephone.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/James A. Climer
JAMES A. CLIMER (0001532)
AMILY A. IMBROGNO (0092434)
100 Franklin's Row
34305 Solon Road
Cleveland, OH 44139
(440) 248-7906
(440) 248-8861 – Fax
Email: jclimer@mrrlaw.com
aimbrogno@mrrlaw.com

OF COUNSEL: BENJAMIN G. CHOJNACKI (0087401)
Walter & Haverfield
3500 Tower at Erieview
1301 East Ninth Street
Cleveland, OH 44114
(216) 619-7850
(216) 916-2430 – Fax
Email: bchojnacki@walterhav.com

Counsel for Defendants City of Chardon, Jeffrey Smock and Scott Niehus

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2019, a copy of the foregoing Motion to Permit Telephone Attendance of Defendants' Insurance Representative was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system and to:

Jonathan Workman
12211 Aquilla Road
Chardon, OH 44024
Email: jwoo224@yahoo.com
Pro Se Plaintiff

s/James A. Climer

JAMES A. CLIMER (0001532)

Counsel for Defendants City of Chardon, Jeffrey Smock and Scott Niehus

TMHCCPR-190237/Motion to Permit Telephone Attendance